

March 4, 2020

The Honorable Sonny Perdue
Secretary
Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

The Honorable Alex M. Azar, II
Secretary
Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Dear Secretary Azar and Secretary Perdue,

Thank you for the dedication of your staff at the US Department of Agriculture (USDA) and Department of Health and Human Services (HHS) to developing science-based recommendations for the upcoming *2020-2025 Dietary Guidelines for Americans (Dietary Guidelines)*. The *Dietary Guidelines* shape food choices made by millions of kids, parents, seniors, and veterans each day and guide more than \$80 billion in federal spending every year.^{1,2}

The undersigned organizations are deeply invested in protecting the health of the nation now and for future generations. As you consider recommendations from the *2020 Dietary Guidelines Advisory Committee*, we urge you to acknowledge and incorporate the body of scientific literature linking dietary patterns, sustainability, and food security in the *2020-2025 Dietary Guidelines*.

Research has long established linkages between healthy diets and reduced risk of chronic diseases such as cancer, type 2 diabetes, and heart disease.³ However, a rapidly expanding body of research shows that the average US diet contributes to environmental impacts such as biodiversity loss, climate change, soil erosion, and water pollution that may threaten the availability of a healthy food supply in the future, putting healthy diets further out of reach for many populations.^{4,5}

The National Nutrition Monitoring and Related Research Act of 1990 requires that the *Dietary Guidelines* be updated every five years “based on the preponderance of the scientific and medical knowledge which is current at the time the report is prepared.”⁶ Meanwhile, the stated goal of the

¹ U.S. Congressional Research Service. Domestic Food Assistance: Summary of Programs (R42353; August 27, 2019), by Alison Aussenberg, Kara Clifford Billings, and Kirsten J Colello. Accessed: February 4, 2020.

Randy, “Domestic Food Assistance: Summary of Programs,” n.d., 22.

² HHS and USDA (Department of Health and Human Services and US Department of Agriculture). 2015. *2015–2020 Dietary Guidelines for Americans*, eighth edition. Washington, DC. https://health.gov/dietaryguidelines/2015/resources/2015-2020_Dietary_Guidelines.pdf

³ Afshin, A., P.J. Sur, K.A Fay et al. 2019. “Health Effects of Dietary Risks in 195 Countries, 1990–2017: A Systematic Analysis for the Global Burden of Disease Study 2017.” *The Lancet* 393(10184)1958–72. [https://doi.org/10.1016/S0140-6736\(19\)30041-8](https://doi.org/10.1016/S0140-6736(19)30041-8).

⁴ Intergovernmental Panel on Climate Change. 2019. *Climate Change and Land: An IPCC Special Report on Climate Change, Desertification, Land Degradation, Sustainable Land Management, Food Security, and Greenhouse Gas Fluxes in Terrestrial Ecosystems*. <https://www.ipcc.ch/site/assets/uploads/2019/11/SRCCL-Full-Report-Compiled-191128.pdf>.

⁵ Brown, M.E., J.M. Antle, P. Backlund et al. 2015. *Climate Change, Global Food Security, and the U.S. Food System*. <https://doi.org/10.7930/J0862DC7>.

⁶ National Nutrition Monitoring and Related Research Act of 1990. 1990. Pub. L. No. 101-445, 104 Stat. 1034.

current edition of the *Dietary Guidelines* is “to make recommendations about the components of a healthy and nutritionally adequate diet to help promote health and prevent chronic disease for current and future generations.”² Yet to date, the *Dietary Guidelines* have dismissed a substantial body of current scientific literature on sustainable diets that can help prevent chronic disease while ensuring a healthy food supply and nutritionally adequate diet remain within reach for years to come.

The *2015 Dietary Guidelines Advisory Committee*, charged with reviewing the best available evidence on the relationships among population-level dietary patterns, sustainability, and food security, concluded that “in general, a dietary pattern that is higher in plant-based foods, such as vegetables, fruits, whole grains, legumes, nuts, and seeds, and lower in animal-based foods is more health promoting and is associated with lesser environmental impact ([greenhouse gas] emissions and energy, land, and water use) than is the current average US diet.” It also concluded that a “diet that is more environmentally sustainable than the average US diet can be achieved without excluding any food groups.”⁷

However, these conclusions were ultimately excluded from the *2015-2020 Dietary Guidelines*, and the *2020 Dietary Guidelines Advisory Committee* was not charged with updating this review of evidence. The omission of this topic from the *2020-2025 Dietary Guidelines* represents not only a failure to act in the public interest, but also a critical missed opportunity for leading health and nutrition experts to assess a rapidly expanding body of research and inform the direction of future studies. For example, additional research is needed to evaluate the cost of sustainable diets, as well as the potential social, economic, and environmental consequences for groups such as farmers, food workers and frontline communities experiencing the impacts of climate change and food insecurity firsthand.⁸

Incorporating sustainability research into national dietary guidance is already a matter of practice for many countries around the world, including Brazil, Canada, Germany, the Netherlands, and Sweden.⁹ Given the compelling evidence related to healthy and sustainable dietary patterns and its critical implications for public health and future food security, it is the responsibility of the US government to address this topic in its national nutrition recommendations.¹⁰

⁷ DGAC (Dietary Guidelines Advisory Committee). 2015. Scientific Report of the 2015 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and the Secretary of Agriculture. Washington, DC: US Department of Agriculture. <https://health.gov/dietaryguidelines/2015-scientific-report>

⁸ Reinhardt, S., R. Boehm, N. Tichenor Blackstone, N.H. El-Abbadi, J.S. McNally Brandow, S.F. Taylor, and M.S. DeLonge. “Review of Dietary Patterns and Sustainability in the United States.” *Advances in Nutrition*. In production. doi: 10.1093/advances/nmaa026

⁹ Gonzalez Fischer, C., and T. Garnett. 2016. *Plates, Pyramids, Planet: Developments in National Health and Sustainable Dietary Guidelines: A State of Play Assessment*. Rome, Italy: Food and Agriculture Organization of the United Nations; Oxford, England: Food Climate Research Network. <http://www.fao.org/3/I5640E/i5640e.pdf>

¹⁰ Rose, D., M.C. Heller, and C.A. Roberto. 2019. Position of the Society for Nutrition Education and Behavior: The Importance of Including Environmental Sustainability in Dietary Guidelines. *Journal of Nutrition Education and Behavior* 51(1):3-15. DOI: <https://doi.org/10.1016/j.jneb.2018.07.006>

We ask that the USDA and HHS lend their full support to the *2020 Dietary Guidelines Advisory Committee* to review the current body of research related to dietary patterns, sustainability, and food security, and to ensure its findings are reflected in the *2020-2025 Dietary Guidelines*.

Thank you for your consideration.

Sincerely,

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